Housing Authority of Salt Lake City

Five Year PHA Plan

Fiscal Years 2020-2024

Date: 11/7/19
Board Resolution
RESOLUTION 721-2019

RESOLUTION OF THE BOARD OF COMMISSIONERS OF THE
HOUSING AUTHORITY OF SALT LAKE CITY
APPROVING THE FISCAL YEAR 2019-2024 PHA FIVE YEAR PLAN

WHEREAS, the U.S. Department of Housing and Urban Development (HUD) requires all
Housing Authorities to submit Five Year Agency Plans as required by the 1998 ‘Quality Housing
and Work Responsibility Act’, and

WHEREAS, the Housing Authority of Salt Lake City has completed related planning and
preparation for the ‘Five Year Plan’ for 2019-2024, and

NOW THEREFORE be it resolved that the Board of Commissioners of the Housing
Authority of Salt Lake City approves the 2019-2024 Agency Five Year Plan.

Passed and approved on this 28th day of October 2019.

Dave Mansell, Chair, HASLC

Daniel Nackerman, Executive Director

Gilmore Bell, PC

APPROVED AS TO FORM:

Gilmore Bell, PC
Salt Lake City Housing Authority
Five Year Plan Fiscal Years 2020-24

Five Year PHA Plan
HUD-50075-5Y
5-Year PHA Plan (for All PHAs)

Purpose. The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA’s operations, programs, and services, and informs HUD, families served by the PHA, and members of the public of the PHA’s mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families.

Applicability. Form HUD-50075-5Y is to be completed once every 5 PHA fiscal years by all PHAs.

A. PHA Information.

A.1 PHA Name: Housing Authority of Salt Lake City

PHA Code: UT004

PHA Plan for Fiscal Year Beginning: (MM/YYYY): 01/2020

PHA Plan Submission Type: ☑ 5-Year Plan Submission

Availability of Information. In addition to the items listed in this form, PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. Additionally, the PHA must provide information on how the public may reasonably obtain additional information on the PHA policies contained in the standard Annual Plan, but excluded from their streamlined submissions. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official websites. PHAs are also encouraged to provide each resident council a copy of their PHA Plans.

See attachment A.1 Housing Authority of Salt Lake City Information Summary

☐ PHA Consortia: (Check box if submitting a Joint PHA Plan and complete table below)

<table>
<thead>
<tr>
<th>Participating PHAs</th>
<th>PHA Code</th>
<th>Program(s) in the Consortia</th>
<th>Program(s) not in the Consortia</th>
<th>No. of Units in Each Program</th>
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<tr>
<td>Lead PHA:</td>
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Page 1 of 3 form HUD-50075-5Y (12/2014)
### B. 5-Year Plan.
Required for all PHAs completing this form.

#### B.1 Mission.
State the PHA’s mission for serving the needs of low-income, very low-income, and extremely low-income families in the PHA’s jurisdiction for the next five years.

The mission of the Housing Authority of Salt Lake City is to provide affordable housing opportunities for our community. With a vision to increase sustainable housing while revitalizing neighborhoods and developing new communities.

#### B.2 Goals and Objectives.
Identify the PHA’s quantifiable goals and objectives that will enable the PHA to serve the needs of low-income, very low-income, and extremely low-income families for the next five years.

See attachment B.2 Goals and Objectives

#### B.3 Progress Report.
Include a report on the progress the PHA has made in meeting the goals and objectives described in the previous 5-Year Plan.

See attachment B.3 Progress Report on Previous Goals

#### B.4 Violence Against Women Act (VAWA) Goals.
Provide a statement of the PHA’s goals, activities objectives, policies, or programs that will enable the PHA to serve the needs of child and adult victims of domestic violence, dating violence, sexual assault, or stalking.

See attachment B.4 Violence Against Women Act (VAWA) Goals

#### B.5 Significant Amendment or Modification.
Provide a statement on the criteria used for determining a significant amendment or modification to the 5-Year Plan.

See attachment B.5 Significant Amendment or Modification

#### B.6 Resident Advisory Board (RAB) Comments.
(a) Did the RAB(s) provide comments to the 5-Year PHA Plan?

<table>
<thead>
<tr>
<th>Y</th>
<th>N</th>
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</tbody>
</table>

(b) If yes, comments must be submitted by the PHA as an attachment to the 5-Year PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.

Will be provided following RAB meeting Sept. 23, 2019

#### B.7 Certification by State or Local Officials.
[Form HUD-50077-SL, Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan](#), must be submitted by the PHA as an electronic attachment to the PHA Plan.
Instructions for Preparation of Form HUD-50075-5Y
5-Year PHA Plan for All PHAs

A. PHA Information 24 CFR §903.23(d)(4(e)

A.1 Include the full PHA Name, PHA Code, , PHA Fiscal Year Beginning (MM/YYYY), PHA Plan Submission Type, and the Availability of Information, specific location(s) of all information relevant to the hearing and proposed PHA Plan.

PHA Consortia: Check box if submitting a Joint PHA Plan and complete the table.

B. 5-Year Plan.

B.1 Mission. State the PHA’s mission for serving the needs of low-income, very low-income, and extremely low-income families in the PHA’s jurisdiction for the next five years. (24 CFR §903.6(a)(1))

B.2 Goals and Objectives. Identify the PHA’s quantifiable goals and objectives that will enable the PHA to serve the needs of low-income, very low-income, and extremely low-income families for the next five years. (24 CFR §903.6(b)(1)) For Qualified PHAs only, if at any time a PHA proposes to take units offline for modernization, then that action requires a significant amendment to the PHA’s 5-Year Plan.

B.3 Progress Report. Include a report on the progress the PHA has made in meeting the goals and objectives described in the previous 5-Year Plan. (24 CFR §903.6(b)(2))

B.4 Violence Against Women Act (VAWA) Goals. Provide a statement of the PHA’s goals, activities objectives, policies, or programs that will enable the PHA to serve the needs of child and adult victims of domestic violence, dating violence, sexual assault, or stalking. (24 CFR §903.6(a)(3))

B.5 Significant Amendment or Modification. Provide a statement on the criteria used for determining a significant amendment or modification to the 5-Year Plan.

B.6 Resident Advisory Board (RAB) comments.

(a) Did the public or RAB provide comments?
(b) If yes, submit comments as an attachment to the Plan and describe the analysis of the comments and the PHA’s decision made on these recommendations. (24 CFR §903.17(a), 24 CFR §903.19)

This information collection is authorized by Section 511 of the Quality Housing and Work Responsibility Act, which added a new section 5A to the U.S. Housing Act of 1937, as amended, which introduced the 5-Year PHA Plan. The 5-Year PHA Plan provides the PHA’s mission, goals and objectives for serving the needs of low-income, very low-income, and extremely low-income families and the progress made in meeting the goals and objectives described in the previous 5-Year Plan.

Public reporting burden for this information collection is estimated to average 76 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

Privacy Act Notice. The United States Department of Housing and Urban Development is authorized to solicit the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality.
Five Year PHA Plan

A. PHA Information

Attachment A.1. Housing Authority of Salt Lake City Information Summary
Attachment A.1

HOUSING AUTHORITY OF SALT LAKE CITY INFORMATION SUMMARY

Housing Authority Information

The Housing Authority of Salt Lake City was created in October 1970 to provide and promote safe and sanitary housing for low-income persons residing in Salt Lake City. The agency is governed by a seven-member board appointed by the Mayor of Salt Lake City, UT and City Council:

- Dave Mansell, commissioner Board Chair
- Brenda Koga, Commissioner Vice-Chair
- Palmer DePaulis, Commissioner
- Les Sparks, Commissioner
- Cindy Gust-Jenson, Commissioner
- David Litvack, Commissioner
- Alfonsa Price, Commissioner

The Executive Director of the Housing Authority is Daniel Nackerman. The Management Team of the authority is Kim Wilford, Deputy Executive Director; Britnee Dabb, Deputy Director; Zac Pau’u, Acting Deputy Director; Mark Short, Director of Finance; and Joe Post, Director of Development and Jackie Rojas, Director of Section 8.

The Housing Authority has an annual budget of approximately $40 million with staff of close to 100 employees. The Housing Authority and it’s non-profit own and manage over 1,600 multifamily units with continued new development in the process. The agency manages voucher programs of over 2,800 households in addition to local grants funding resources for Landlord Outreach, Housing Search Assistance and Deposit Assistance.

PHA Availability of Information

A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. Additionally, the PHA must provide information on how the public may reasonably obtain additional information on the PHA policies contained in the standard Annual Plan but excluded from their streamlined submissions. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official websites. PHAs are also encouraged to provide each resident council a copy of their PHA Plans.
The PHA plan will be available for review at the Housing Authority main office at 1776 South West Temple, Salt Lake City, UT as well as posted for review on the Housing Authority website, available at our four Public Housing properties:

- Rendon Terrace 158 North 600 West, Salt Lake City, UT 84116
- Romney Plaza 475 East 900 South, Salt Lake City, UT 84111
- City Plaza 1992 South 200 East, Salt Lake City, UT 84190
- Philips Plaza 660 South 300 East, Salt Lake City, UT 84111

The Draft will be reviewed at the Resident Advisory Board (RAB) Meeting on September 25, 2019 1:00 p.m. at Romney Plaza, and presented at the Housing Authority Board Meeting for public comment on October 258, 2019.

**Designated Housing for Elderly and Disabled Families**

Of the 1,600 units operated by the Housing Authority, 390 of those are Public Housing units under 3 AMPS. City Plaza, Rendon Terrace and Romney/Philips Plazas. These units are designated with HUD approval last received on September 11, 2019 as follows:

<table>
<thead>
<tr>
<th>Property</th>
<th>Code</th>
<th>Elderly</th>
<th>Accessible disabled</th>
</tr>
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<tbody>
<tr>
<td>City Plaza</td>
<td>UT004004002</td>
<td>143</td>
<td>7</td>
</tr>
<tr>
<td>Philips Plaza</td>
<td>UT004004001</td>
<td>89</td>
<td>10</td>
</tr>
<tr>
<td>Rendon Terrace</td>
<td>UT004004005</td>
<td>70</td>
<td>10</td>
</tr>
<tr>
<td>Romney Plaza</td>
<td>UT004004001</td>
<td>70</td>
<td>10</td>
</tr>
</tbody>
</table>

**Occupancy by Police Officers**

In order to provide an increased sense of security for Public Housing residents, the PHA will allow complex units to be occupied by police officers. Police officers will not be required to be income eligible to qualify for admission to the PHA’s public housing program. The PHA prefers to have the police officer drive a marked police vehicle to demonstrate a police presence in the complex. The officer can park the police vehicle on the premises. However, if the officer does not have a marked vehicle they will not be allowed to live in public housing. Police occupied units include the following:

<table>
<thead>
<tr>
<th>Property</th>
<th>Code</th>
<th>Units</th>
</tr>
</thead>
<tbody>
<tr>
<td>City Plaza</td>
<td>UT004004002</td>
<td>one</td>
</tr>
<tr>
<td>Philips Plaza</td>
<td>UT004004001</td>
<td>one</td>
</tr>
<tr>
<td>Romney Plaza</td>
<td>UT004004001</td>
<td>one</td>
</tr>
</tbody>
</table>
Salt Lake City Housing Authority
Five Year PHA Plan Fiscal Years 2020-24

Five Year PHA Plan

B. Five Year PHA Plan

Attachment B.2 Goals and Objectives
Attachment B.2

GOALS AND OBJECTIVES

Emerging goals and objectives at HASLC, guided primarily through a strategic planning process held with Commissioners, staff and a resident leader, can be described as follows:

A) Increase partnerships and participate in more regional strategies in order to gain resources and be more comprehensively effective as an agency.
B) Continue to develop and attain more capacity for additional living units through real estate activities.
C) Continue to apply for additional vouchers aggressively and increase capacity with sophisticated management of HUD programs.
D) Control development and major construction costs and schedules.
E) Strengthen FSS Program with increased outreach in personal finance and homeownership preparation.
F) Increase funding and capacity to assist local leaders and agencies with responses to homelessness.
G) Improve Commission/Staff communications through added transparency, additional training, and successful communication techniques.
H) Increase public information activities significantly.
I) Modernize work order systems through current software, upgraded hardware and additional
J) Exit the Public Housing Program through Rental Assistance Demonstration (RAD) or Section 22 Voluntary Conversion to Housing Choice.
K) Analyze and apply for HUD's MTW Program- third or fourth cohort.
L) Gain funding and capacity for Aging-In-Place Senior Sites.
M) Increase leadership training in modern management practices and leadership visibility-Job Training programs.
N) Solve VA funding and facility crisis with Valor House, VASH utilization and exit Grant Per Diem program.
O) Increase Neighborhood presence with assistance in City housing goals.
P) Software upgrades and improvement in technical efficiencies- phone systems, Yardi updates, security systems and website.
Q) Launch paperless practices.
R) Renovation of Housing Authority Office to improve safety and security.
S) Formalization of Insurance with safety coordination efforts and risk management systems.
T) Centralize/Modernize Wait List Systems.

The HASLC is proud of its recent growth and accomplishments and looks forward to better assisting its residents and landlords over the coming year.
Five Year PHA Plan

B. Five Year PHA Plan

Attachment B.3 Progress Report on Previous Goals and Objectives
Attachment B.3

PROGRESS REPORT ON PREVIOUS GOALS AND OBJECTIVES

The Housing Authority provided detailed goals and objectives in its 5-Year Plan which can be summarized as follows, noting overall progress to date in italics:

Develop New Properties: Consistently and well underway. Development of LIHTC project, Taylor Gardens was completed 2016 – 112 units for Senior residents, 9th East Lofts, a 6 story multifamily LIHTC project with 68 units was completed in 2017, and Pamela’s Place 100 units of Permanent Supportive Housing for chronic homelessness is currently under construction.

Utilize Project-Based Vouchers to a greater Extent: New rounds include Pamela’s Place, First Step House and Magnolia/Liberty Homes projects. Well underway

Utilize RHF Funds to Fund Rendon Terrace: Completed

Apply for Additional Vouchers Aggressively: Well underway- Successful in Increases of VASH, Non-Elderly Disabled mainstream and Family Unification Program Vouchers.

Strengthen FSS Programs in Areas of Personal Finance and Homeownership Preparation: Well underway- Partnerships with Community Development Corporation of Utah and Triple A Fair Credit Foundation as well as People Helping People and Circles have resulted in 46 graduates between 2016-2019 while maintaining a program of 130 participants.

Update the ‘Administrative Plan’ Comprehensively: Completed

Analyze and Consider Utilizing HUD’s RAD Program: Expected to close on project Rendon Terrace before the close of 2019. Currently under CHAPS for all remaining Public Housing properties with rehab at City Plaza in the planning phases.

Study HCV Homeownership Option: Incomplete

Analyze and Consider HUD’s MTW Program: Completed. Intend to apply

Gain Funding/Capacity for Aging-In-Place at Senior Sites: Incomplete

Protect Section 8 Residents If Possible, from Program Elements Such as Rising Rents: Underway- Regular increases in voucher payment standards and recent attainment of TANF and ESG grants providing housing search assistance, Landlord Outreach program, deposit and application assistance funding has resulted in greater lease up success while funding received for eviction prevention has increased those maintaining housing.

Educate Local, State and National Leaders Regarding Programs and Related Success: Consistent and well underway
Increase Funding and Capacity to Assist in Local Homeless Responses: Major progress continues, evident and well underway

As noted, the Housing Authority continues to make significant progress in meeting its goals and objectives. The PHA's Mission is to serve the needs of low, very low and extremely low income families in the PHA jurisdiction. Recent highlights include:

- The HASLC Family Self Sufficiency program, with 129 participants over that past year, has brought 27 graduates by the end of 2019.
- The HASLC partnered with SLC Department of Economic Development, Salt Lake Community College, and Catholic Community Services for a pilot program providing free housing and job training in the construction trades/framing to 12 chronically homeless persons we called the Framing Project. This resulted in 3-4 full time employed and self-sufficient community members. This project received a national award from NAHRO.
- The HASLC applied for and was awarded Temporary Assistance for Needy Families (TANF) funding of $1,000,000 to cover 3 years for staffing and rental assistance, deposits, utilities and homeless prevention. Additionally, HASLC received a state grant for TANF expansion funding one full time staff member and $140,000 in additional rental assistance as well as a third grant to cover 2 full time landlord outreach specialists.
- The HASLC received and leased 49 additional VASH Vouchers in 2017 for the Freedom Landing property.
- The HASLC received 35 Non-Elderly Disabled Mainstream Vouchers
- The HASLC received 18 Tenant Protection vouchers for Wasatch Manor project based for senior housing
- The HASLC received three Shelter Plus Care grant renewals-and manages a large HOPWA grant.
- The HASLC was renewed for a COC grant for PSH case management.
- The HASLC was awarded funds for two full time FSS case managers.
- The HASLC maintains High Performer Status in SEMAP, Capital Funds and Section 8 Management.
- The HSLC received grant awards and donations from Salt Lake County Government, Morgan Stanley, Exelis, LDS Humanitarian Center and others for programs and items such as eviction prevention, community gardens, community areas, food pantries, holiday donations and much more.
- Updates in Section 504/ADA are continuing at all Public Housing properties including an updated Language Access Plan and physical accessibility improvements. Through the RAD transition, updates will continue at City Plaza, Romany Plaza and Philips Plaza.
- A new mixed income development was completed through HASLC non-profit affiliates housing 68 family residents.
- Homeless housing solutions have ostensibly doubled over the past 3-4 years thanks to new VASH funding and aggressive resource attainment by the HASLC.
- PHA has made improvements to existing Public Housing using Capital Fund dollars, such as Phillips Plaza main entry door replacement, 2 pump circulator replacement, main lobby carpet
replacement and wooden door staining, community kitchen replacement (to comply with ADA requirements), partial main sewer replacement, continued carpet replacement with vinyl planks. At Romney plaza the north side windows were installed, parking lot crack seal and repaired, two pole lights replaced with LED, 2 A/C pump replaced also continued replacement of unit carpet with vinyl planks, the north side of interior walls were painted from the bottom to the top floor. At City Plaza the top floor suspended ceiling was painted, 2 heating boiler upgraded. At City, Romney and Phillips smoking canopy was installed. Storm drain at maintenance building parking lot was repaired and the West side parking lot at main office and maintenance building parking lot was repaired and slurry coated.

The HASLC is proud of its recent growth and accomplishments and looks forward to better assisting its residents and landlords over the coming year.
Salt Lake City Housing Authority
Five Year PHA Plan Fiscal Years 2020-24

Five Year PHA Plan

B. Five Year PHA Plan

Attachment B.4 Violence Against Women Act (VAWA) Goals
Attachment B.4

VIOLENCE AGAINST WOMEN ACT (VAWA)

Provide a statement of the PHA's goals, activities objectives, policies, or programs that will enable the PHA to serve the needs of child and adult victims of domestic violence, dating violence, sexual assault, or stalking.

In an effort to enhance the safety of the applicant/resident, the Housing Authority will work with service providers to offer case management services to those in need. Training to various groups of staff: those responsible for determining an applicant's eligibility for housing; those at the housing developments or voucher program case managers responsible for overseeing resident continued occupancy; and Resident Services staff. Staff will be trained on how to obtain information needed from the applicant/resident/participant seeking protection under VAWA and make appropriate referrals to agencies that have been identified as offering assistance to such victims. The HASLC will notify all current residents and voucher holders of its policy documents and that they should contact their manager or case manager in the event they are a victim of or are facing lease violations for an actual or threatened domestic abuse event. All applicants will receive certification forms with their application packet that will offer them the opportunity to make staff aware that they are or have been a victim of an actual or threatened domestic violence incident that may impact their application for housing. These provisions have been incorporated into HASLC's Administrative Plan and Admissions and Continued Occupancy Policy.

The Housing Authority of Salt Lake City ensures that all residents, program participants and Landlords are notified about their rights and of their obligations under VAWA. Participants are offered choices for housing options, such as moving, removal of the perpetrator and providing referrals to outside agencies for assistance to families. The Housing Authority Emergency Transfer Plan for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking provides information on eligibility, documentation requirements, confidentiality protection, and how an emergency transfer may occur with guidance on safety and security.

A victim of domestic violence, dating violence, sexual assault or stalking is eligible for emergency transfer if the tenant reasonably believes that there is a threat of imminent harm from further violence if the tenant remains within the same unit. All information submitted to the Housing Authority is held confidential. Although the Housing Authority cannot guarantee that a request will be approved or how long it will take, staff will act as quickly as possible to move a tenant to another unit, subject to availability and safety and program eligibility. The Housing Authority owns many options for housing with subsidy under multiple programs and will take all steps allowed to provide safety and security.

In addition to flexibility within the housing stock under the Housing Authority portfolio, the Housing Choice Voucher program includes Landlord education and partnering to assist victims in allowing moves within lease terms and assistance in housing search.
Five Year PHA Plan

B. Five Year PHA Plan

Attachment B.5  Statement of Significant Amendment
Attachment B.5

STATEMENT OF SIGNIFICANT AMENDMENT

Provide a statement on the criteria used for determining a significant amendment or modification to the 5-Year Plan.

Significant Amendment or Substantial Deviation/Modification – as referenced in the Quality Housing and Work Responsibility Act of 199, Section 511, (g), a significant amendment or modification to the annual plan may not be adopted, other than at a duly called meeting of the governing board of the public housing agency that is open to the public after a 45 day public notice; and be implemented, until notification of the amendment of modification is provided to the Secretary of the Department of Housing and Urban Development (HUD) and approved. Amendments or modifications, which are not defined as being significant and will not be subject to a public meeting with a 45-day public notice and notification to the Secretary of HUD will be the following amendments or modifications:

1. The transfer of work projects, from one grant year to another in the Capital Fund Program 9(fungibility), which are included in the approved Capital Fund Program 5-year action plan;

2. The transfer of funds in the Capital Fund Program from one line item to another within the same grant year budget;

3. Additional work projects funded by the Capital Fund Program not included in the 5-year action plan, which have been deemed to be emergencies;

4. Policy changes resulting from HUD or other federal agency mandates, regulations, or directives; and

5. Any changes in the Housing Choice Voucher Administrative Plan or Public Housing Admissions and Continued Occupancy Policy, which are not specifically described in the HUD PHA 5-Year and Annual Plan or required PHA Plan elements.

The Housing Authority of Salt Lake City submitted a RAD PHA Plan/Significant Amendment, approved by HUD May 2, 2019 for RAD Conversion. The PHA was issued a Commitment to Enter into a Housing Assistance Payments Contract (CHAP) under the Rental Assistance Demonstration (RAD).

See attached.
May 2, 2019

VIA ELECTRONIC MAIL

Mr. Daniel Nackerman, Executive Director
Housing Authority of Salt Lake City
1776 SW Temple
Salt Lake City, UT 84115
dnackerman@haslcutah.org

SUBJECT: RAD PHA Plan/Significant Amendment Submission

Dear Mr. Nackerman:

This correspondence is to inform the Housing Authority of Salt Lake City that the PHA Plan or Significant Amendment, submitted to HUD on April 25, 2019 is approved.

As the PHA has been issued a Commitment to Enter into a Housing Assistance Payments Contract (CHAP) under the Rental Assistance Demonstration (RAD), we reviewed the submission for compliance with PIH Notice 2012-32 (HA), “Rental Assistance Demonstration – Final Implementation,” as revised and currently in effect. We have found compliance with the required elements and determined that the RAD PHA Plan milestone if fulfilled. The Housing Authority’s approved PHA Plan Significant Amendment Submission must be made available for review and inspection at the principal office of the Housing Authority during normal business hours.

Upon receipt of this letter, you should upload it to the appropriate section of the RAD Resource Desk. If you have any questions, please contact Anita Short, Portfolio Manager at Anita.J.Short@hud.gov or (801) 524-6096.

Sincerely,

Lori Strange for
Janice Rodriguez, Director
Signed by: LORI STRANGE

5/2/2019
SIGNIFICANT AMENDMENT: RENTAL ASSISTANCE DEMONSTRATION PROJECT BASED VOUCHER CONVERSIONS

HASLC's Board of Commissioners approved application to HUD to convert its public housing and portfolio under the RAD program August 27th, 2018. HASLC is amending its Public Housing Authority (PHA) Annual and 5-Year Plan because HASLC's application to convert 390 public housing units -- the balance of its Public Housing portfolio -- was accepted and HUD issued Commitments to Enter into Housing Assistance Payment Contracts (CHAP's) in November 2018. As a result, HASLC will be converting its Public Housing to Project Based Vouchers (PBV) under the guidelines of PIH Notice 2012-32, REV-3 and any successor Notices.

This proposed amendment provides additional information as required by HUD concerning HASLC's RAD portfolio conversion plans. It is HASLC's intention to incorporate this proposed amendment in its entirety into the 2020 PHA Plan.

HASLC is adopting the resident rights, participation, waiting list, and grievance procedures listed in Section 1.6C and 1.6 D of PIH Notice 2012-32, REV-3 as it pertains to PBV with the RAD conversion.

The RAD conversion complies with all applicable site selection and neighborhood reviews standards and all appropriate procedures have been followed. HASLC is compliant with all fair housing and civil rights requirements. HASLC is currently subject to, and in compliance with, a Voluntary Compliance Agreement, Case Numbers: 08-11-R005-4 (Section 504), 08-11-R005-6 (Title VI), and 08-11-R004-3 (Section 3).

The conversion to RAD Project Based Vouchers will not negatively impact or cause non-compliance with the VCA agreements. HASLC is not subject to any consent order, consent decree, final judicial ruling or administrative ruling that has any relation to or impact on the planned RAD conversion.

RAD was designed by HUD to assist in addressing the capital needs of public housing by providing HASLC with access to private sources of capital to repair and preserve its affordable housing assets. Upon conversion, HASLC's Capital Fund budget will be reduced by the pro rata share of Public Housing Developments converted as part of the Demonstration, and HASLC may also borrow funds to address capital needs. HASLC will also be contributing Operating Reserves and all remaining Capital Funds balances towards the conversion.

A recent Physical Needs Assessment for each development has been completed and any needs will be addressed at each location.

HASLC does not have debt under an Energy Performance Contract (EPC) or Capital Fund Financings for these property conversions.
**SIGNIFICANT AMENDMENT: RENTAL ASSISTANCE DEMONSTRATION PROJECT BASED VOUCHER CONVERSIONS**

Following is specific information related to the Public Housing Developments selected for PBV conversion under RAD.

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<tr>
<th>Development # 1</th>
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<tbody>
<tr>
<td><strong>Name of PH Development:</strong> City Plaza</td>
<td></td>
</tr>
<tr>
<td><strong>PIC Development ID:</strong> UT004000402</td>
<td></td>
</tr>
<tr>
<td><strong>Conversion Type:</strong> PBV</td>
<td></td>
</tr>
<tr>
<td><strong>Transfer of Assistance (if yes, put the location if known and # units transferring):</strong> NO</td>
<td></td>
</tr>
<tr>
<td><strong>Total Units:</strong> 70</td>
<td></td>
</tr>
<tr>
<td><strong>Pre-RAD Unit Type (Family, Senior, etc.):</strong> 143 Senior, 7 Mixed Designation</td>
<td></td>
</tr>
<tr>
<td><strong>Post-RAD Unit Type if different (i.e. Family, Senior, etc.):</strong> 136 Senior, 7 Mixed Designation</td>
<td></td>
</tr>
<tr>
<td><strong>Capital Fund allocation of Development</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Utilization of remaining balance at time of transition</strong></td>
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</tr>
<tr>
<td><strong>Bedroom Type</strong></td>
<td><strong>Number of Units Pre-Conversion</strong></td>
</tr>
<tr>
<td><strong>1 Bedroom</strong></td>
<td>150</td>
</tr>
</tbody>
</table>

If performing a Transfer of Assistance, explain how transferring waiting list

RAD CHAP received November 8, 2018 Public housing capital funds will be used to finance the project to specifications identified in the needs assessment.

Evidence of consultation with residents

Two meetings held in August 2018

Description of PHA's proposed future use of the development

Existing PH units are being converted to Project Based Vouchers. No changes to residential configurations or structure.

Relocation Plan

No residents will need to be relocated with this conversion.
**SIGNIFICANT AMENDMENT: RENTAL ASSISTANCE DEMONSTRATION PROJECT BASED VOUCHER CONVERSIONS**

<table>
<thead>
<tr>
<th>Development # 2</th>
<th>Name of PH Development: Philips Plaza/Romney Plaza</th>
<th>PIC Development ID: UT004000401</th>
<th>Conversion Type: PBV</th>
<th>Transfer of Assistance (if yes, put the location if known and # units transferring): NO</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Units:</td>
<td>169 Pre-RAD Unit Type (Family, Senior, etc.):</td>
<td>89 Senior, 80 mixed accessible</td>
<td>Post-RAD Unit Type if different (i.e. Family, Senior, etc.)</td>
<td>85 Senior, 76 mixed accessible</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Capital Fund allocation of Development</td>
<td>Utilization of remaining balance at time of transition</td>
</tr>
<tr>
<td>Bedroom Type</td>
<td>Number of Units Pre-Conversion</td>
<td>Number of Units Post-Conversion</td>
<td>Change in Number of Units and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.):</td>
<td></td>
</tr>
<tr>
<td>1 Bedroom</td>
<td>169</td>
<td>161</td>
<td>5% De Minimis Reduction</td>
<td></td>
</tr>
<tr>
<td></td>
<td>If performing a Transfer of Assistance, explain how transferring waiting list</td>
<td>n/a</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Identification and obligation status of public housing funds</td>
<td>RAD CHAP received November 8, 2018 Public housing capital funds and 4% tax credits will be used to finance the project to specifications identified in the needs assessment.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Evidence of consultation with residents</td>
<td>Two meetings held in August 2018</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Description of PHA’s proposed future use of the development</td>
<td>Existing PH units are being converted to Project Based Vouchers. The third party needs assessment identified a rehab scope that will be included in the scope of work with 4% tax credits.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Relocation Plan</td>
<td>No residents will need to be relocated with this conversion.</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Development # 3</th>
<th>Name of PH Development: Rendon Terrace Apts.</th>
<th>PIC Development ID: UT004000405</th>
<th>Conversion Type: PBV</th>
<th>Transfer of Assistance (if yes, put the location if known and # units transferring): NO</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Units:</td>
<td>70 Pre-RAD Unit Type (Family, Senior, etc.):</td>
<td>70 Senior</td>
<td>Post-RAD Unit Type if different (i.e. Family, Senior, etc.)</td>
<td>70 Senior</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Capital Fund allocation of Development</td>
<td>292,392</td>
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<tr>
<td>Bedroom Type</td>
<td>Number of Units Pre-Conversion</td>
<td>Number of Units Post-Conversion</td>
<td>Change in Number of Units and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.):</td>
<td></td>
</tr>
<tr>
<td>1 Bedroom</td>
<td>62</td>
<td>62</td>
<td>0</td>
<td></td>
</tr>
<tr>
<td>2 Bedroom</td>
<td>8</td>
<td>8</td>
<td>0</td>
<td></td>
</tr>
<tr>
<td></td>
<td>If performing a Transfer of Assistance, explain how transferring waiting list</td>
<td>n/a</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Identification and obligation status of public housing funds</td>
<td>RAD CHAP received November 8, 2018 Public housing capital funds will be used to finance the project to specifications identified in the needs assessment.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Evidence of consultation with residents</td>
<td>Two meetings held in August 2018, and again on April 2019</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Description of PHA's proposed future use of the development</td>
<td>Existing PH units are being converted to Project Based Vouchers. No changes to residential configurations or structure.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>-------------------------------------------------------------</td>
<td>----------------------------------------------------------------------------------------------------------------</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Relocation Plan</td>
<td>No residents will need to be relocated with this conversion.</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
SIGNIFICANT AMENDMENT: RENTAL ASSISTANCE DEMONSTRATION PROJECT BASED VOUCHER CONVERSIONS

PBV Resident Rights and Participation.

1. No Re-screening of Tenants upon Conversion. Pursuant to the RAD statute, at conversion, current households are not subject to rescreening, income eligibility, or income targeting. Consequently, current households will be grandfathered for conditions that occurred prior to conversion but will be subject to any ongoing eligibility requirements for actions that occur after conversion. For example, a unit with a household that was over-income at time of conversion would continue to be treated as an assisted unit. Thus, 24 CFR § 982.201, concerning eligibility and targeting, will not apply for current households. Once that remaining household moves out, the unit must be leased to an eligible family. MTW agencies may not alter this requirement.

2. Right to Return. There will be no relocation of residents required.

3. Renewal of Lease. Since publication of the PIH Notice 2012-32 Rev 3, the regulations under 24 CFR § 983.257(b)(3) have been amended requiring Project Owners to renew all leases upon lease expiration, unless cause exists. MTW agencies may not alter this requirement.

4. Phase-in of Tenant Rent Increases. If a tenant’s monthly rent increases by more than the greater of 10 percent or $25 purely as a result of conversion, the rent increase will be phased in over 3 or 5 years. To implement this provision, HUD is specifying alternative requirements for section 3(a)(1) of the Act, as well as 24 CFR § 983.3(definition of “total tenant payment” (TTP)) to the extent necessary to allow for the phase-in of tenant rent increases. A PHA must create a policy setting the length of the phase in period at three years, five years or a combination depending on circumstances. For example, a PHA may create a policy that uses a three year phase in for smaller increases in rent and a five year phase-in for larger increases in rent. This policy must be in place at conversion and may not be modified after conversion.

The method described below explains the set percentage-based phase-in the owner must follow according to the phase-in period established. For purposes of this section “standard TTP” refers to the TTP calculated in accordance with regulations at 24 CFR §5.628 and the “most recently paid TTP” refers to the TTP recorded on line 9j of the family’s most recent HUD Form 50058. If a family in a project converting from Public Housing to PBV was paying a flat rent immediately prior to conversion, the PHA should use the flat rent amount to calculate the phase-in amount for Year 1, as illustrated below.

Three Year Phase-in:
Year 1: Any recertification (interim or annual) performed prior to the second annual recertification after conversion – 33% of difference between most recently paid TTP or flat rent and the standard TTP
Year 2: Year 2 Annual Recertification (AR) and any Interim Recertification (IR) prior to Year 3 AR – 66% of difference between most recently paid TTP and the standard TTP
Year 3: Year 3 AR and all subsequent recertifications – Full standard TTP

Five Year Phase-in:
Year 1: Any recertification (interim or annual) performed prior to the second annual recertification after conversion – 20% of difference between most recently paid TTP or flat rent and the standard TTP
Year 2: Year 2 AR and any IR prior to Year 3 AR – 40% of difference between most recently paid TTP and the standard TTP
SIGNIFICANT AMENDMENT: RENTAL ASSISTANCE DEMONSTRATION PROJECT BASED VOUCHER CONVERSIONS

Year 3: Year 3 AR and any IR prior to Year 4 AR – 60% of difference between most recently paid TTP and the standard TTP

Year 4: Year 4 AR and any IR prior to Year 5 AR – 80% of difference between most recently paid TTP and the standard TTP

Year 5 AR and all subsequent re-certifications — Full standard TTP

Please Note: In either the three year phase-in or the five-year phase-in, once the standard TTP is equal to or less than the previous TTP, the phase-in ends and tenants will pay full TTP from that point forward. MTW agencies may not alter this requirement.

HASLC has elected to follow the Three-Year Phase-in Plan.

Family Self Sufficiency (FSS) and Resident Opportunities and Self Sufficiency Service Coordinator (ROSS-SC) programs. Public Housing residents that are current FSS participants will continue to be eligible for FSS once their housing is converted under RAD, and PHAs will be allowed to use any remaining PH FSS funds, to serve those FSS participants who live in units converted by RAD. Due to the program merger between PH FSS and HCV FSS that took place pursuant to the FY14 Appropriations Act (and was continued in the FY15 Appropriations Act), no special provisions are required to continue serving FSS participants that live in public housing units converting to PBV under RAD.

However, PHAs should note that there are certain FSS requirements (e.g. escrow calculation and escrow forfeitures) that apply differently depending on whether the FSS participant is a participant under the HCV program or a public housing resident, and PHAs must follow such requirements accordingly. All PHAs will be required to administer the FSS program in accordance with FSS regulations at 24 CFR Part 984, the participants’ contracts of participation, and the alternative requirements established in the “Waivers and Alternative Requirements for the FSS Program” Federal Register notice, published on December 29, 2014, at 79 FR 78100. Further, upon conversion to PBV, already escrowed funds for FSS participants shall be transferred into the HCV escrow account and be considered TBRA funds, thus reverting to the HAP account if forfeited by the FSS participant.

HASLC Currently has no ROSS or FSS participants in the current Public Housing program and all units are Senior/Disabled. Eligible participants may enroll following entry into the PBV program.

Resident Participation and Funding. In accordance with Attachment 1B, residents of Covered Projects with converted PBV assistance will have the right to establish and operate a resident organization for the purpose of addressing issues related to their living environment and be eligible for resident participation funding.

Resident Procedural Rights. The following items must be incorporated into both the Section 8 Administrative Plan and the Project Owner’s lease, which includes the required tenancy addendum, as appropriate. Evidence of such incorporation may be requested by HUD for purposes of monitoring the program.

Termination Notification. HUD is incorporating additional termination notification requirements to comply with section 6 of the Act for public housing projects that convert assistance under RAD. In addition to the regulations at 24 CFR § 983.257 related to Project Owner termination of tenancy and eviction (which MTW agencies may not alter) the termination procedure for RAD conversions to PBV will
SIGNIFICANT AMENDMENT: RENTAL ASSISTANCE DEMONSTRATION PROJECT BASED VOUCHER CONVERSIONS

require that PHAs provide adequate written notice of termination of the lease which shall not be less than:
a. A reasonable period of time, but not to exceed 30 days:
   i. If the health or safety of other tenants, PHA employees, or persons residing in the immediate vicinity of the premises is threatened; or
   ii. In the event of any drug-related or violent criminal activity or any felony conviction;
b. 14 days in the case of nonpayment of rent; and
c. 30 days in any other case, except that if a State or local law provides for a shorter period of time, such shorter period shall apply.

Grievance Process. Pursuant to requirements in the RAD Statute, HUD is establishing additional procedural rights to comply with section 6 of the Act. For issues related to tenancy and termination of assistance, PBV program rules require the Project Owner to provide an opportunity for an informal hearing, as outlined in 24 CFR § 982.555. RAD will specify alternative requirements for 24 CFR § 982.555(b) in part, which outlines when informal hearings are not required, to require that:
a. In addition to reasons that require an opportunity for an informal hearing given in 24 CFR § 982.555(a)(1)(i)-(vi), 26 an opportunity for an informal hearing must be given to residents for any dispute that a resident may have with respect to a Project Owner action in accordance with the individual’s lease or the contract administrator in accordance with RAD PBV requirements that adversely affect the resident’s rights, obligations, welfare, or status.
   i. For any hearing required under 24 CFR § 982.555(a)(1)(i)-(vi), the contract administrator will perform the hearing, as is the current standard in the program. The hearing officer must be selected in accordance with 24 CFR § 982.555(e)(4)(i).
   ii. For any additional hearings required under RAD, the Project Owner will perform the hearing.
   b. There is no right to an informal hearing for class grievances or to disputes between residents not involving the Project Owner or contract administrator.
   c. The Project Owner gives residents notice of their ability to request an informal hearing as outlined in 24 CFR § 982.555(c)(1) for informal hearings that will address circumstances that fall outside of the scope of 24 CFR § 982.555(a)(1)(i)-(vi).
   d. The Project Owner provides opportunity for an informal hearing for an eviction.

Current PBV program rules require that hearing procedures must be outlined in the PHA’s HCV Administrative Plan.
The above procedures can be found in the HASLC HCV Administrative Plan in Chapter 17.

Earned Income Disregard (EID). Tenants who are employed and are currently receiving the EID exclusion at the time of conversion to continue to receive the EID after conversion, in accordance with regulations at 24 CFR § 5.617. Upon the expiration of the EID for such families, the rent adjustment shall not be subject to rent phase-in, as described in Section 1.6.C.4; instead, the rent will automatically rise to the appropriate rent level based upon tenant income at that time.

Under the Housing Choice Voucher program, the EID exclusion is limited only to persons with disabilities (24 CFR § 5.617(b)). In order to allow all tenants (including non-disabled persons) who are employed and currently receiving the EID at the time of conversion to continue to benefit from this exclusion in the PBV project, the provision in section 5.617(b) limiting EID to disabled persons is waived. The waiver, and resulting alternative requirement, apply only to tenants receiving the EID at the time of conversion. No other tenant (e.g., tenants who at one time received the EID but are not receiving the EID exclusion at the time of conversion e.g., due to loss of employment; tenants that move into the property following conversion, etc.), is covered by this waiver.
SIGNIFICANT AMENDMENT: RENTAL ASSISTANCE DEMONSTRATION PROJECT BASED VOUCHER CONVERSIONS

Jobs Plus. Not applicable to HASLC.

When Total Tenant Payment Exceeds Gross Rent. Under normal PBV rules, the PHA may only select an occupied unit to be included under the PBV HAP contract if the unit’s occupants are eligible for housing assistance payments (24 CFR §983.53(d)). Also, a PHA must remove a unit from the contract when no assistance has been paid for 180 days because the family’s TTP has risen to a level that is equal to or greater than the contract rent, plus any utility allowance, for the unit (i.e., the Gross Rent) (24 CFR §983.258). Since the rent limitation under this Section of the Notice may often result in a family’s TTP equaling or exceeding the gross rent for the unit, for current residents (i.e., residents living in the public housing property prior to conversion), HUD is waiving both of these provisions and requiring that the unit for such families be placed on and/or remain under the HAP contract when TTP equals or exceeds the Gross Rent. Further, HUD is establishing the alternative requirement that the rent to owner for the unit equal the family’s TTP until such time that the family is eligible for a housing assistance payment. HUD is waiving as necessary to implement this alternative provision, the provisions of Section 8(o)(13)(H) of the Act and the implementing regulations at 24 CFR 983.301 as modified by Section 1.6.B.5 of this Notice. 27 In such cases, the resident is considered a participant under the program and all of the family obligations and protections under RAD and PBV apply to the resident. Likewise, all requirements with respect to the unit, such as compliance with the HQS requirements, apply as long as the unit is under HAP contract. Assistance may subsequently be reinstated if the tenant becomes eligible for assistance. The PHA is required to process these individuals through the Form-50058 submodule in PIC.

Following conversion, 24 CFR §983.53(d) applies, and any new families referred to the RAD PBV project must be initially eligible for a HAP payment at admission to the program, which means their TTP may not exceed the gross rent for the unit at that time. Further, a PHA must remove a unit from the contract when no assistance has been paid for 180 days. If units are removed from the HAP contract because a new admission’s TTP comes to equal or exceed the gross rent for the unit and if the project is fully assisted, HUD is imposing an alternative requirement that the PHA must reinstate the unit after the family has vacated the property; and, if the project is partially assisted, the PHA may substitute a different unit for the unit on the HAP contract in accordance with 24 CFR §983.207 or, where “floating” units have been permitted, Section 1.6.B.10 of this Notice.

Under-Occupied Unit. If a family is in an under-occupied unit under 24 CFR 983.259 at the time of conversion, the family may remain in this unit until an appropriate-sized unit becomes available in the Covered Project. When an appropriate sized unit becomes available in the Covered Project, the family living in the under occupied unit must move to the appropriate-sized unit within a reasonable period of time, as determined by the administering Voucher Agency. In order to allow the family to remain in the under-occupied unit until an appropriate-sized unit becomes available in the Covered Project, 24 CFR 983.259 is waived. MTW agencies may not modify this requirement.

PBV: Other Miscellaneous Provisions
1. Access to Records, Including Requests for Information Related to Evaluation of Demonstration. PHAs must agree to any reasonable HUD request for data to support program evaluation, including but not limited to project financial statements, operating data, Choice-Mobility utilization, and rehabilitation work. Please see Appendix IV for reporting units in Form HUD-50058.
2. Additional Monitoring Requirement. The PHA’s Board must approve the operating budget for the Covered Project annually in accordance with HUD requirements.

3. Davis-Bacon Act and Section 3 of the Housing and Urban Development Act of
SIGNIFICANT AMENDMENT: RENTAL ASSISTANCE DEMONSTRATION PROJECT BASED VOUCHER CONVERSIONS

1968 (Section 3). This section has been moved to 1.4.A.13 and 1.4.A.14.

4. Establishment of Waiting List. 24 CFR § 983.251 sets out PBV program requirements related to establishing and maintaining a voucher-wide, PBV program wide, or site-based waiting list from which residents for the Covered Project will be admitted. These provisions will apply unless the project is covered by a remedial order or agreement that specifies the type of waiting list and other waiting list policies.
   
i. Transferring an existing site-based waiting list to a new site-based waiting list. If the PHA is transferring the assistance to another neighborhood, the PHA must notify applicants on the wait-list of the transfer of assistance, and on how they can apply for residency at the new project site or other sites. Applicants on a project-specific waiting list for a project where the assistance is being transferred shall have priority on the newly formed waiting list for the new project site in accordance with the date and time of their application to the original project's waiting list.
   
ii. Informing applicants on the site-based waiting list on how to apply for a PBV program-wide or HCV program-wide waiting list.

Informing applicants on a public housing community-wide waiting list on how to apply for a voucher-wide, PBV program-wide, or site-based waiting list. If using a site-based waiting list, PHAs shall establish a waiting list in accordance with 24 CFR § 903.7(b)(2)(i)-(iv) to ensure that applicants on the PHA’s public housing community-wide waiting list have been offered placement on the converted project’s initial waiting list. In all cases, PHAs have the discretion to determine the most appropriate means of informing applicants on the public housing community-wide waiting list given the number of applicants, PHA resources, and admissions requirements of the projects being converted under RA.D. A PHA may consider contacting every applicant on the public housing waiting list via direct mailing; advertising the availability of housing to the population that is less likely to apply, both minority and non-minority groups, through various forms of media (e.g., radio stations, posters, newspapers) within the marketing area; informing local non-profit entities and advocacy groups (e.g., disability rights groups); and conducting other outreach as appropriate. Applicants on the agency’s public housing community-wide waiting list who wish to be placed onto the newly-established site-based waiting list must be done so in accordance with the date and time of their original application to the centralized public housing waiting list. Any activities to contact applicants on the public housing waiting list must be conducted in accordance with the requirements for effective communication with persons with disabilities at 24 CFR § 8.6 and with the obligation to provide meaningful access for persons with limited English proficiency (LEP).

A PHA must maintain any site-based waiting list in accordance with all applicable civil rights and fair housing laws and regulations unless the project is covered by a remedial order or agreement that specifies the type of waiting list and other waiting list policies.

To implement this provision, HUD is specifying alternative requirements for 24 CFR §983.251(c)(2).

However, after the initial waiting list has been established, the PHA shall administer its waiting list for the converted project in accordance with 24 CFR §983.251(c).

HASLC currently maintains site based Public Housing wait lists and will convert from Public Housing Site Based to PBV Site Based waiting list. There will be no change to placement, a straight conversion. All those currently on the wait list will be notified of the transition within the requirements for effective communication.

Mandatory Insurance Coverage. The Covered Project shall maintain at all times commercially available property and liability insurance to protect the project from financial loss and, to the extent insurance proceeds permit, promptly restore, reconstruct, and/or repair any damaged or destroyed project property.
SIGNIFICANT AMENDMENT: RENTAL ASSISTANCE DEMONSTRATION PROJECT BASED VOUCHER CONVERSIONS

6. Agreement Waiver. This section has been moved to 1.6.(8)(7).

7. Future Refinancing. Project Owners must receive HUD approval for any refinancing or restructuring of permanent debt during the HAP contract term, to ensure the financing is consistent with long-term preservation. (Current lenders and investors are also likely to require review and approval of refinancing of the primary permanent debt.)

Administrative Fees for Public Housing Conversions during Transition Period. For the remainder of the Calendar Year in which the HAP Contract is effective (i.e. “transition period”), RAD PBV projects will be funded with public housing funds. For example, if the project’s assistance converts effective July 1, 2015, the public housing Annual Contributions Contract (ACC) between the PHA and HUD will be amended to reflect the number of units under HAP contract, but will be for zero dollars, and the RAD PBV contract will be funded with public housing money for July through December 2015. Since TBRA is not the source of funds, PHAs should not report leasing and expenses into VMS during this period, and PHAs will not receive section 8 administrative fee funding for converted units during this time.

For fiscal years 2014 and 2015, PHAs operating HCV program received administrative fees for units under a HAP contract, consistent with recent appropriation act references to "section 8(q) of the [United States Housing Act of 1937] and related appropriations act provisions in effect immediately before the Quality Housing and Responsibility Act of 1998" and 24 CFR § 982.152(b). During the transition period mentioned in the preceding paragraph, these provisions are waived, and PHAs will not receive section 8 ongoing administrative fees for PBV RAD units.

After this transition period, the Section 8 ACC will be amended to include Section 8 funding that corresponds to the units covered by the Section 8 ACC. At that time, the regular Section 8 administrative fee funding provisions will apply.

Choice-Mobility. One of the key features of the PBV program is the mobility component, which provides that if the family has elected to terminate the assisted lease at any time after the first year of occupancy in accordance with program requirements, the PHA must offer the family the opportunity for continued tenant based rental assistance, in the form of either assistance under the voucher program or other comparable tenant-based rental assistance.

If as a result of participation in RAD a significant percentage of the PHA’s HCV program becomes PBV assistance, it is possible for most or all of a PHA’s turnover vouchers to be used to assist those RAD PBV families who wish to exercise mobility. While HUD is committed to ensuring mobility remains a cornerstone of RAD policy, HUD recognizes that it remains important for the PHA to still be able to use tenant based vouchers to address the specific housing needs and priorities of the community. Therefore, HUD is establishing an alternative requirement for PHAs where, as a result of RAD, the total number of PBV units (including RAD PBV units) under HAP contract administered by the PHA exceeds 20 percent of the PHA's authorized units under its HCV ACC with HUD.

The alternative mobility policy provides that an eligible voucher agency would not be required to provide more than three-quarters of its turnover vouchers in any single year to the residents of Covered Projects. While a voucher agency is not required to establish a voucher inventory turnover cap, if such a cap is implemented, the voucher agency must create and maintain a waiting list in the order in which the requests from eligible households were received. In order to adopt this provision, this alternative mobility policy must be included in an eligible PHA’s administrative plan. To effectuate this provision, HUD is providing an alternative requirement to Section 8(o)(13)(E) and 24 CFR part 983.261(c). Please
Reserve for Replacement. The Project Owner shall establish and maintain a replacement reserve in an interest-bearing account to aid in funding extraordinary maintenance and repair and replacement of capital items in accordance with applicable regulations. The reserve must be built up to and maintained at a level determined by HUD to be sufficient to meet projected requirements. For FHA transactions, Replacement Reserves shall be maintained in accordance with the FHA Regulatory Agreement. For all other transactions, Replacement Reserves shall be maintained in a bank account covered under a General Depository Agreement (HUD-51999) or similar instrument, as approved by HUD, where funds will be held by the Project Owner or mortgagee and may be drawn from the reserve account and used subject to HUD guidelines and as directed by HUD.
Salt Lake City Housing Authority
Five Year PHA Plan Fiscal Years 2020-24

Five Year PHA Plan

B. Five Year PHA Plan

Attachment B.6 Resident Advisory Board Comments
Resident Advisory Board Comments

The Housing Authority of Salt Lake City Five Year Plan was presented at the Resident Advisory Board Meeting in detail on September 25, 2019.

No comments were received regarding the PHA Plan at the RAB Board Meeting or following. The meeting minutes are attached for reference.
MINUTES

Resident Advisory Board (RAB) Meeting
Wednesday September 25, 2019  2:00 pm  Romney Plaza

Present:

RAB Members:  Gary Leimback – Phillips Plaza
               Steve Underwood – Rendon Terrace
               Judy Lee – City Plaza, Chairperson

HASLC Staff:  Kristine Sloan – Phillips Plaza Property Manager
              Gayle Stephenson – Romney Plaza Property Manager
              Kim Wilford – Deputy Executive Director, Housing Authority of Salt Lake City

Guests:  Truman Sands – Romney Plaza
         Pauline Lamb – City Plaza

Welcome to RAB members, Housing staff, and guests. Judy asked if there were any comments or changes to add to the minutes of the previous meeting. Steve motioned to approve the minutes and Gary seconded.

Kim passed around the draft of the 5-year plan that the Housing Authority must submit to HUD and review with the RAB Board as well as an annual plan. Kim stated that there would be a copy available at each of the Public Housing properties as well as at the main office for any tenants to review. Also, there will be an open comment period during the October Housing Board meeting which is at 11:00 a.m. on the fourth Monday of each month.

Kim continued: The components of the 5-year plan are to let the public know any major policy changes or new directions of pursuit, goals and objectives of the next 5 years, and review of the previous 5-year plan. Attachment A1 in the packet is the Housing Authority Information Sheet providing information on the Board Members, Executive Director and Management Team and the PHA availability of information and where the 5-year plan will be available for the public to review, including the PH properties and the Main Office. There is also the Designation for Elderly and Disabled Families and to continue the designation for all the ADA units at the Elderly and Disabled properties, three Police Officer units at City Plaza, Phillips Plaza, and Romney Plaza.

Item B is the Mission of the Housing Authority: to provide affordable housing opportunities for our community with the vision to increase sustainable housing by revitalizing neighborhoods and developing new communities. So, as we make decisions, we keep our Mission in mind. Item B2 are the Goals and Objectives for the upcoming 5 years. These are major topics and major areas the
Housing Authority wants to increase partnerships in the city. This includes developing more housing, applying for additional vouchers, control development costs, strengthen the Family Self Sufficiency program and increase the involvement with the families specifically home ownership. Other items include addressing funding with outside agencies to help with Homeless issues in the community is important, improve commissioner and board member communication, increase transparency, more training, improve public information communication, modernization of work order systems, software, hardware, and security systems as well.

The Housing Authority continues to work on exiting the Public Housing program through the RAD conversion and holding public meetings to address the process or Section 22 voluntary conversion, pursuing the Moving to Work program to give the Housing Authority more flexibility to combine funding like vouchers and Public Housing to help families in more creative ways. We are also looking at Aging in Place that would allow our seniors to stay in place so they don’t have to move again, and this would include development of properties for seniors that would have services on site to help with Aging in Place. Leadership Training, Management Practices, and Veterans Programs and funding with the VA, and an Increased neighborhood presence through community meetings, and electronic services for applications, renewals, and other paper work, renovating the main office itself with increased safety and awareness, as well as a centralized wait list system are also things we are working on.

There is also a progress report on our previous goals that you can all read through, but some of the highlights include building Tax Credit properties, Taylor Gardens for Seniors and 9th Street Lofts, current construction on Pamela’s Place for Chronic Homelessness, Family Self Sufficiency program, partnering with the Department of Economic Development and Catholic Community Services, and our Free Housing and Job Development program.

The next section is a required statement on how the Housing Authority will handle Victims of Domestic Abuse when someone is living with the perpetrator and how we will move them to other assistance or housing or remove the perpetrator from the home. After that is a section defining what a significant amendment to the 5 year plan would look like and how it would be detailed (under $50,000 is not considered significant), policy changes to the ACOP and how they are handled through the board process, and a letter detailing the significant change we did last regarding the RAD property conversion is included as well as about 10 pages in depth about the process.

Section B6 is waiting for comments from the Board here after reading through the materials; B7 is where the Housing Authority must certify that our goals are in line with the City’s Plans for Housing, and certification that Housing is compliance with all rules and regulations from HUD.

Gary commented that there seem to be a lot of good things going on that probably most people are not aware of, especially the homeless programs. Kim mentioned that Housing has been working with the City and State to provide housing for many homeless individuals and not put them back into the
shelters. Kris mentioned that Gary has written some articles on homelessness and his experiences with it. Kim continued that if there are any other comments from the RAB or other tenants on the 5-year plan to contact her via phone, email, or through the property managers so they can be included in the comments section.

Judy brought up the discussion on increasing the number of board members to better reflect the Public Housing tenant population at the various buildings. The suggestion includes 3 for City Plaza, 2 for Phillips Plaza and one each at Romney and Rendon. Steve mentioned that they are still needing board member from Romney currently. Gayle mentioned that there had been some interest for the position, but none were at the meeting today.

Gayle asked Truman if he was interested and he stated that he had been on the board previously and did not have a good experience. He felt that suggestions and comments that were made about the communities were not followed up on by the Housing Authority, so he has no interest in being a member again, he is attending for information as to what is going on at the meeting. Judy mentioned that she felt the board had a new direction in terms of policy and Gary thought that Romney had recently been upgraded to new windows and the new funding sources would allow for more upgrades.

Truman stated that it was not about the money itself but how it is used and that is his concern with the Housing Authority. He continued that the track record and how the Housing Authority uses the money has not been good in the past and is concerned for it in the future. Truman also feels one of the biggest issues involves the parking at Romney Plaza and the lack of parking enforcement. No one has ever been towed, some tenants have 2 cars that are parked, and regularly his spot is taken and must find other parking.

Gayle mentioned that she found that Handicap parking spaces should only be occupied for 2 hours maximum and then the police can be called for a tow. Truman continued that it is almost impossible to enforce when managers are not around, and it is probably true of every location. Everyone agrees that the parking situation is especially difficult at Romney due to the lack of spaces. Kris and Gayle agreed that this should be included in the plan for improvement for Romney Plaza.

Judy feels like the tenants need to be more responsible and call the police when there are trespassers and illegal parking because the manager cannot be everywhere all the time. Truman feels as though he has exhausted all the things he can do as a tenant and there has been no improvement. He understands that it is nearly impossible for managers to enforce in the time they have with their other duties, but something needs to be done. Gayle is just learning about the sticker system for management of the parking, and she will also work on updating the parking list so that she is aware of who should be parking their vehicles in the lot.
The Agenda item involving the letter to Alfonsa needs to be addressed at the next meeting since no one is sure exactly what that involves. Gary wonders if the officers on site at the properties can do parking enforcement to help? Judy stated that at City Plaza the officer could not since he lived there but he could call other officers and they have come and handed out parking tickets. Truman mentioned he had spoke with a previous officer and he confirmed the same that they are not able to perform Police duties on site, but they are a great presence to have and will call when necessary.

Steve mentioned that at his last tenant information meeting some of the things that tenants were interested in were: Yoga for Pain, a grant to have someone come in and do crafts in the crafts room, and an exercise for wellness program that’s been seen at the VA. The group agreed that both Rendon and Romney need more activities in place due to not being near a senior center like Phillips and City. He thinks this would really help to get people out and be active. Gary said the Blood Pressure clinic they do helps to have them come out and Kris stated that she is going to have a Doctor come on a regular basis soon to help provide medical services to tenants.

Truman also wanted to bring up that he feels the Management of Housing is making it difficult for the Maintenance staff to do their work by not giving them the resources they need. He understands that the hours have been changed recently for the third time. You know how important the maintenance person is in the building and they are often there when the manager is not and have a lot to deal with. He thinks the Housing Authority should be focusing more on retaining these good people because they will higher new people who don’t know what they are doing.

Judy and Pauline mentioned that staff leave and go to the County Housing because they get paid more, and the County property next to them has more Maintenance and Office Staff. The group agrees that the Maintenance at all the buildings are very sensitive to tenant needs and they want to keep people in place that can provide that type of service.

Judy mentioned that Pauline was nominated to be a new member of the RAB board for City Plaza. Judy requested a vote on the nomination and the board members agreed. Pauline Lamb is appointed the new RAB member for City Plaza. Steve motioned to Adjourn and Gary seconded.

Meeting concluded at 2:50 pm
Salt Lake City Housing Authority
Five Year PHA Plan Fiscal Years 2020-24

Five Year PHA Plan

B. Five Year PHA Plan

Attachment B.7 Certificate of State & Local Officials

HUD 50077-SL
Certification by State or Local Official of PHA Plans
Consistency with the Consolidated Plan or State Consolidated Plan

I, Lani Eggertsen-Goff, the Director, Housing & Neighborhood Development,
certify that the 5-Year PHA Plan and/or Annual PHA Plan of the
Housing Authority of Salt Lake City

is consistent with the Consolidated Plan or State Consolidated Plan and the Analysis of
Impediments (AI) to Fair Housing Choice of the
City of Salt Lake

pursuant to 24 CFR Part 91.

Provide a description of how the PHA Plan is consistent with the Consolidated Plan or State
Consolidated Plan and the AI.

The PHA Plan goals are aligned with the Salt Lake City Consolidated Plan, and the State 10 Year Plan to
End Homelessness. The PHA and Salt Lake City continue to leverage and strategically target resources to
address increasing housing needs.

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. Warning: HUD will
prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3730)

Name of Authorized Official
Lani Eggertsen-Goff

Title
Director, Housing & Neighborhood Development, Salt Lake City Corp.

Signature

Date
11/7/2019
Salt Lake City Housing Authority
Five Year PHA Plan Fiscal Years 2020-24

Five Year PHA Plan

C. Certification of Compliance with PHA Plan and Related Regulations

HUD 50077-ST-HCV-HP
Certifications of Compliance with PHA Plans and Related Regulations (Standard, Troubled, HCV-Only, and High Performer PHAs)  

U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing  
OMB No. 2577-0226  
Expires 02/29/2016

PHA Certifications of Compliance with the PHA Plan and Related Regulations including Required Civil Rights Certifications

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairman or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the ___ 5-Year and/or ___ Annual PHA Plan for the PHA fiscal year beginning 1/1/2020, hereinafter referred to as “the Plan”, of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:

1. The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.
2. The Plan contains a certification by the appropriate State or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice, for the PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan.
3. The PHA has established a Resident Advisory Board or Boards, the membership of which represents the residents assisted by the PHA, consulted with this Resident Advisory Board or Boards in developing the Plan, including any changes or revisions to the policies and programs identified in the Plan before they were implemented, and considered the recommendations of the RAB (24 CFR 903.13). The PHA has included in the Plan submission a copy of the recommendations made by the Resident Advisory Board or Boards and a description of the manner in which the Plan addresses these recommendations.
4. The PHA made the proposed Plan and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the Plan and invited public comment.
5. The PHA certifies that it will carry out the Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990.
6. The PHA will affirmatively further fair housing by examining their programs or proposed programs, identifying any impediments to fair housing choice within those programs, addressing those impediments in a reasonable fashion in view of the resources available and work with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement and by maintaining records reflecting these analyses and actions.
7. For PHA Plans that includes a policy for site based waiting lists:
   • The PHA regularly submits required data to HUD's 50058 PIC/IMS Module in an accurate, complete and timely manner (as specified in PIH Notice 2010-25);
   • The system of site-based waiting lists provides for full disclosure to each applicant in the selection of the development in which to reside, including basic information about available sites; and an estimate of the period of time the applicant would likely have to wait to be admitted to units of different sizes and types at each site;
   • Adoption of a site-based waiting list would not violate any court order or settlement agreement or be inconsistent with a pending complaint brought by HUD;
   • The PHA shall take reasonable measures to assure that such a waiting list is consistent with affirmatively furthering fair housing;
   • The PHA provides for review of its site-based waiting list policy to determine if it is consistent with civil rights laws and certifications, as specified in 24 CFR part 903.7(c)(1).
8. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
10. The PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
11. The PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.
12. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
13. The PHA will provide the responsible entity or HUD any documentation that the responsible entity or HUD needs to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58 or Part 50, respectively.
14. With respect to public housing the PHA will comply with Davis-Bacon or HUD determined wage rate requirements under Section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
15. The PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.
16. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act, the Residential Lead-Based Paint Hazard Reduction Act of 1992, and 24 CFR Part 35.
17. The PHA will comply with the policies, guidelines, and requirements of OMB Circular No. A-87 (Cost Principles for State, Local and Indian Tribal Governments), 2 CFR Part 225, and 24 CFR Part 85 (Administrative Requirements for Grants and Cooperative Agreements to State, Local and Federally Recognized Indian Tribal Governments).
18. The PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the regulations and included in its Plan.
19. All attachments to the Plan have been and will continue to be available at all times and all locations that the PHA Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the PHA in its PHA Plan and will continue to be made available at least at the primary business office of the PHA.
20. The PHA certifies that it is in compliance with applicable Federal statutory and regulatory requirements, including the Declaration of Trust(s).

_Housing Authority of Salt Lake City___
PHA Name

_____ Annual PHA Plan for Fiscal Year 20____

_____x_ 5-Year PHA Plan for Fiscal Years 2020 - 2024

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3782).

Name of Authorized Official

Daniel Nackerman

Signature

Title

Executive Director

Date

10/31/2019
Order Confirmation for 0001267503

Client: HOUSING AUTHORITY OF SLC
Client Phone: 8014872161
Address: 1776 S. WEST TEMPLE
          SALT LAKE CITY, UT 84115
Email: qwiperi@haslc.utah.org

Account #: 9001394693
Ordered By: DARRIN
Account Exec: Itapuso2
PO Number: PUBLIC NOTICE

Total Amount: $120.00
Payment Amt: $0.00
Amount Due: $120.00

Text: PUBLIC NOTICE

Ad Number: 0001267503-01
Ad Type: Legal Liner
Ad Size: 2 x 23 II
Color: 

WYSIWYG Content

PUBLIC NOTICE

NOTICE IS HEREBY GIVEN that on the 28th day of October 2019, at the hour of 11:00 a.m. of said day at the Housing Authority of Salt Lake City, 1776 S. West Temple, Salt Lake City, Utah, the Housing Authority will hold and conduct a public hearing on and pertaining to the Five Year Agency Plan. The purpose of this public hearing is to receive public comment concerning the Agency Plan. Copies of the draft annual plan are available for review at the Housing Authority office, 1776 South West Temple, and also at these properties:
- Bandon Terrace
  138 North 600 West, Salt Lake City, UT 84116
- Romney Plaza
  475 East 900 South, Salt Lake City, UT 84111
- City Plaza
  1992 South 200 East, Salt Lake City, UT 84190
- Phillips Plaza
  600 South 300 East, Salt Lake City, UT 84111

Product: Salt Lake Tribune
Placement: Legal Liner Notice
Position: 998

Scheduled Dates:
- 09/22/2019
- TR utahlegals.com
- 09/22/2019
- TR utahlegals.com
- 09/23/2019
- Salt Lake Tribune
- Legal Liner Notice
- 998
- 09/23/2019

9/17/2019 9:16:10AM